

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KING RANGE, JR.,
Plaintiff,
v.
FLEMINGTON ESTATES LLC and FRANKIE
SHOP, LLC,
Defendants.

Civil Action No.
1:25-cv-02633-MMG

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the Declaration of Avram E. Frisch dated June 18, 2025, and the exhibits annexed thereto; and upon the accompanying memorandum of law; and upon all the pleadings and prior proceedings had herein, Defendant Flemington Estates LLC (the “Landlord Defendant”) will move this Court, before the Honorable Margaret M. Garnett, at the United States District Court, Southern District of New York, 40 Foley Square, Courtroom 906, New York, NY 10007, for an order:

- (a) Dismissing the Complaint as against the Landlord Defendant; and
- (b) Granting as such other and further relief as the Court deems just and proper.

THE LAW OFFICE OF AVRAM E.
FRISCH LLC
Attorneys for Defendant, Flemington Estates
LLC


By: _____

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Dated: June 18, 2025